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ICC

Submitted via email: jim.zolnierek@illinios.gov/torsten.clausen@illinois.gov

RE: ICC Energy Storage Program Workshop: Comments – Meeting of January 20th, 2022

Enel North America appreciates the opportunity to participate in the Illinois Commerce Commission (ICC) Energy Storage Workshops and supports the efforts of ICC staff in advancing energy storage in IL. Enel has contributed to the design of energy storage programs in several US states and Canadian provinces. Participation in these programs provides us a unique perspective on best practices and pitfalls in program design. Through this participation, we've witnessed multiple cost-effectiveness frameworks, and we've included several recommendations below.

For 20 years Enel North America has been a renewable energy leader and innovator in the United States and Canada. Our goal is to help companies and consumers find value in sustainability. Through Enel Green Power, Enel X and Energy and Commodities we are driving toward a decarbonized future. Currently Enel has successfully developed over 70 behind-the-meter energy storage system projects, the largest non-wire alternative project in New York City[1], and now Lily Solar + Storage[2] in Texas, Enel Green's Power's first utility-scale solar and storage project.

Enel recommends the ICC staff review the following publications regarding frameworks to identify and measure the potential costs and benefits that the deployment of energy storage can produce.

1. **Public Utilities Regulatory Authority Docket No.17-12-03RE03 – PURA Investigation into Distirbution System Planning of the Electric Distribution Companies – Electric Storage[3]**
   July 28, 2021
   Based on the Equitable Modern Grid Decision by PURA, the topic of electric storage in Connecticut was explored including technology applications to leverage the value of electric storage most effectively for the net benefit of the electric distribution system. Starting on Page 30 of the Decision, five Cost Benefit tests were included. Each of the tests included multiple categories of benefits and costs including but not limited to avoided energy, avoided generation capacity, avoided Transmission and Distribution (T&D) capacity, and reliability, as well specific ISO-NE costs.

[1] https://corporate.enelx.com/en/stories/2019/12/storage-system-energy-gateway-center

[2] https://www.enelgreenpower.com/our-projects/under-construction/lily-solar-storage-project

[3] https://portal.ct.gov/-/media/PURA/electric/Final-Decision-17-12-03RE03.pdf

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2. **Energy Storage: The New Efficiency – How States can use energy efficiency funds to support battery storage and flatten costly demand peaks**[4]
   Clean Energy Group – Todd Olinsky-Paul
   April 2019
   This paper focuses on how Massachusetts created a new energy storage pay-for-performance program through the innovative use of state energy efficiency funds. Page 11 highlights the non-energy benefits and value of storage including avoided power outages, higher property values, avoided fines to utilities for outages, job creation and reduced land use.

3. **Energy Storage Policy Best Practices from New England – Ten Lesson from Six States**[5]
   Clean Energy Group – Todd Olinsky-Paul
   August 2021
   Following up on previous papers published by Clean Energy Group, Lesson #2 focuses on the value of energy storage benefits in cost-benefits analyses. Both monetized and non-monetizable benefits should become critical to energy storage policy making and cost-benefits tests. See page 13.

Enel looks forward to its continued participation in the Energy Storage Workshop at the ICC. Please follow up with any questions or if further information required.

Yours truly,

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[4] https://www.cleanegroup.org/ceg-resources/resource/energy-storage-the-new-efficiency/

[5] https://www.cesa.org/resource-library/resource/energy-storage-policy-best-practices-from-new-england/